

ATTACHMENT II

(to Defendant's Position)

Reed, Michael

From: Williamson, Holly
Sent: Thursday, October 27, 2016 4:04 PM
To: Jamisen Etzel
Cc: Gary Lynch (glynch@carlsonlynch.com); Reed, Michael; Dumbacher, Robert; Pierce, Susan
Subject: Proposed motion per Court's recent order
Attachments: 62785524_4.docx

Jamisen and Gary,

Please review and let me know what you think. It seems to make sense that we not engage in class discovery or pay for experts until we know the outcome of the pending motions.

Thanks,

Holly



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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JOSEPH R. HERRON, individually and	§	
On behalf of all others similarly situated,	§	
	§	
Plaintiff,	§	Civil Action No. 2:15-cv-01664-MPK
	§	
v.	§	Chief Magistrate Judge Maureen P. Kelly
	§	
INVESTMENT PROFESSIONALS, INC.,	§	
	§	
Defendant.	§	

JOINT MOTION REGARDING SCHEDULING

In response to the Court's Order directing the parties to prepare a joint proposed Case Management Scheduling Order [Dkt. 60], the parties request that in light of Defendant's pending Motion for Summary Judgment [Dkt. 39], and Plaintiff's Motion for Conditional Class Certification all current case deadlines be stayed. Should the Court deny Defendant's Motion for Summary Judgment, and depending on the outcome of the Motion for Conditional Class Certification, the parties agree to meet, confer and propose an appropriate joint Case Management Scheduling Order. The parties respectfully submit that proceeding in this manner will conserve both judicial and party resources.

Respectfully submitted,

**CARLSON LYNCH SWEET &
KILPELA, LLP**

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on this ____ day of _____, 2016, and will be served on all counsel of record via the Court's electronic filing system (CM/ECF). Parties may access this filing through the Court's system.

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